

Exhibit A

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

MULHOLLAND ENERGY SERVICES, LLC §

§
Plaintiff, §

§
v. §

§
KLAUS, INC. §

§
Defendant/Third-Party Plaintiff, §

CASE NO. SA-24-CA-00093-XR

§
v. §

§
ENBRIDGE STORAGE (CUSHING) L.L.C.; §
and CLERMONT INNOVATIVE DESIGN, §
LLC, §

§
Third-Party Defendants. §

DECLARATION OF KELLY GRAY

I, Kelly Gray, pursuant to Section 132.001 of the Texas Civil Practice and Remedies Code and 28 § U.S.C. 1746, declare the following:

1. My name is Kelly Gray, I am of sound mind and over the age of eighteen, and my business address is 915 North Eldridge Parkway, Suite 1100, Houston, Texas 77079. The statements and facts contained herein are within my knowledge and are true and correct.
2. I am employed as a Managing Legal Counsel by Enbridge Employee Services, Inc., which is an indirect, wholly owned subsidiary of Enbridge Inc. and an affiliate of Enbridge Storage (Cushing) L.L.C. I am duly authorized to sign this declaration on behalf of Enbridge Storage (Cushing) L.L.C. in my capacity as the Corporate Secretary of Enbridge Storage (Cushing) L.L.C.
3. I have reviewed Enbridge Storage (Cushing) L.L.C.'s *Motion to Strike for Improper Impleader and Motion to Dismiss for Improper Venue* in this matter. The corporate entity

information set forth therein regarding Enbridge Storage (Cushing) L.L.C. is within my knowledge as Corporate Secretary and is true and correct.

4. Enbridge Storage (Cushing) L.L.C. is not a resident of the Western District of Texas. Enbridge Storage (Cushing) L.L.C. does not maintain offices within the Western District of Texas.
5. Enbridge Storage (Cushing) L.L.C. is a single member-managed Delaware limited liability company with its principal place of business at 915 North Eldridge Parkway, Suite 1100, Houston, Texas 77079.
6. Enbridge Storage (Cushing) L.L.C. owns and operates a facility commonly referred to as the “Cushing Facility” located at 2101 South Linwood Avenue, Cushing, Oklahoma.
7. Enbridge Storage (Cushing) L.L.C. does not own, employ, supervise, or provide equipment or personnel for or related to an oilfield drilling site located in Pleasanton, Texas.
8. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Harris, County, State of Texas, on the 8th day of November, 2024.



Kelly Gray